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10  
11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 William Wade,

14 Plaintiff,

15 v.

16 Richland Holdings, Inc.,

17 Defendant.

Case No.: 2:20-cv-02031-RFB-DJA

**Stipulation for an extension of time  
for Plaintiff to respond to  
Defendant's motion to stay  
discovery [ECF No. 15]**

**(First request)**

18 William Wade ("Plaintiff") and Richland Holdings, Inc. ("Defendant  
19 and together with Plaintiff as the "parties"), by and through their respective  
20 counsel, hereby submit this stipulation for an extension of time for Plaintiff to  
21 respond to Defendant's motion to stay, filed on February 9, 2021. This is the  
22 first request for an extension of this deadline.

23 The extension is sought because Plaintiff's counsel requires additional  
24 time to prepare an appropriate response to the motion. In turn, Plaintiff agrees  
25 that Defendant shall have an addition seven days to file its reply.  
26  
27

1 In good faith and not for the purposes of delay, the parties therefore  
2 stipulate that:

3 (1) Plaintiff's opposition to the pending motion shall be due on or  
4 before **March 2, 2021**; and

5 (2) Defendant's reply shall be due on or before **March 16, 2021**.

6 IT IS SO STIPULATED.

7 Dated: February 23, 2021.

8 **KIND LAW**

9 /s/ Michael Kind  
10 Michael Kind, Esq.  
11 8860 South Maryland Parkway, Suite 106  
12 Las Vegas, Nevada 89123  
13 *Attorney for Plaintiff William Wade*

14 **MARQUIS AURBACH COFFING**

15 /s/ Jared M. Moser  
16 Jared M. Moser, Esq.  
17 10001 Park Run Drive  
18 Las Vegas, Nevada 89145  
19 *Counsel for Richland Holdings Inc.*

20 IT IS SO ORDERED:

21   
22 \_\_\_\_\_  
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: February 24, 2021  
25 \_\_\_\_\_  
26 \_\_\_\_\_  
27 \_\_\_\_\_